

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LINCOLN ADVENTURES, LLC, a
Delaware Limited Liability Company, and
MICHIGAN MULTI-KING, INC., a
Michigan Corporation, on Behalf of
Themselves and All Those Similarly Situated,

Plaintiff,

vs.

THOSE CERTAIN UNDERWRITERS AT
LLOYD'S, LONDON MEMBERS OF
SYNDICATES, et al,

Defendants.

No. 2:08-cv-00235-CCC-JAD

**[PROPOSED] ORDER GRANTING DEFENDANT SYNDICATES'
MOTION FOR A PROTECTIVE ORDER**

THIS MATTER having come before this Court on motion brought by Defendant Syndicates 510, 727, 1003, 1084, 1096, 1245, 2003, 2020, 2488, and 2791 for a protective order limiting further discovery sought by Plaintiffs Lincoln Adventures, LLC and Michigan Multi-King by the Plaintiffs' Second Set of Requests for Documents (the "Second Requests"), this Court having considered all arguments and submissions proffered by the parties in respect of this Motion, and for good cause having been shown, it is

ON THIS the _____ day of _____, 2020, hereby:

ORDERED that the Defendant Syndicates' Motion for a Protective Order is **GRANTED**.

It is **FURTHER ORDERED** that:

With respect to Second Request Nos. 1, 2, and 11, the Syndicates' discovery obligations shall be satisfied by the Syndicates' request to Xchanging to provide data reflecting fields agreed upon by the parties for all direct U.S. risks involving any of the Syndicates for the period from January 1, 2008 to December 31, 2013 and the Syndicates' production of fifty (50) binding authority or lineslip agreements chosen by the Plaintiffs from the period of 2008 to 2013.

The Syndicates shall not be required to search for or produce any documents responsive to Second Request Nos. 3 and 5.

With respect to Second Request Nos. 6-8, the Syndicates' discovery obligations shall be satisfied by a production of responsive, non-privileged documents obtained through a reasonable search for documents within the Syndicates' possession, custody or control that have been shared with or otherwise distributed amongst more than one syndicate not under management by the same managing agent.

In producing documents in response to the Second Requests, the Syndicates shall not be required to undertake electronic keyword searching.

SO ORDERED

JOSEPH A. DICKSON, U.S.M.J.